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Attorneys for Defendants, COUNTY OF
LOS ANGELES and CARLOS MACIEL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ALEXIS CERNAS, JOHN I.C. DOE, a
minor, by and through his guardian ad
litem Maritza Casillas; JANE I.C. DOE,
and, a minor, by and through her
guardian ad litem Maritza Casillas; and
BEATRIZ LOERA,

Plaintiffs,

v.

COUNTY OF LOS ANGELES,
CARLOS MACIEL, and DOES 1
through 10, inclusive,

Defendants.

Case No. 2:24-cv-03261-SPG-SK
District Judge, Sherilyn Peace Garnett
Magistrate Judge, Steve Kim

**STIPULATION AND JOINT
REQUEST FOR DISMISSAL OF
DEFENDANT CARLOS MACIEL
WITHOUT PREJUDICE**

Proposed Order filed Concurrently

TO THE HONORABLE COURT

Defendants County of Los Angeles and Detective Carlos Maciel, and Plaintiffs
Alexis Cernas, John I.C. Doe – by and through his guardian ad litem Maritza Casillas,
Jane I.C. Doe – by and through her guardian ad litem Maritza Casillas, and Beatriz
Loera (the Parties), stipulate and submit their joint request for dismissal of defendant
CARLOS MACIEL from this action without prejudice based on the following good
cause.

GOOD CAUSE STATEMENT:

1. The parties participated in a mediation with ADR Panel Mediator, Richard Copeland on August 1, 2025. At that time, the parties reached a tentative settlement agreement, contingent upon the recommendation of the settlement by the County's Contract Cities Claims Board, approval by the County's Board of Supervisors, plaintiffs' execution of a release of claims, and the Court's approval of a minors' compromise.
2. Since that time, the County's Contract Cities Claims Board recommended the settlement agreement, and the parties have successfully negotiated a mutually-agreeable release of claims.
3. As a term and condition of the settlement agreement, the parties agree that defendant CARLOS MACIEL should be dismissed from this action without prejudice, so that the settlement proceeds as between the plaintiffs and defendant COUNTY OF LOS ANGELES only.
4. The parties further agree that once the settlement has been fully-consummated, that the parties will file a stipulation and joint request for dismissal of Deputy CARLOS MACIEL, the COUNTY OF LOS ANGELES, and all remaining claims/causes of action alleged against them with prejudice.
5. Further, the parties agree that if the County's Board of Supervisors does not vote to approve the settlement, this stipulation and joint request will not foreclose the ability of plaintiffs to file a request to rename CARLOS MACIEL as a defendant in the action. Defendants do not anticipate such occurrence, but in the unlikely event that the settlement is not approved, Defendants will stipulate to adding CARLOS MACIEL back into the lawsuit, and will waive any argument regarding statute of limitations and any other objections.
6. The parties anticipate that it will likely take up to and including twelve months for the settlement to be finalized.

7. Based on the foregoing good cause, the parties jointly stipulate and request that defendant CARLOS MACIEL be dismissed without prejudice from this action.

Respectfully submitted,

DATED: October 17, 2025

LAW OFFICES OF DALE K. GALIPO

By /s/ Renee Masongsong

Dale K. Galipo
Renee Masongsong
Attorneys for Plaintiffs

DATED: October 17, 2025

CARRILLO LAW FIRM, LLP

By /s/ Dominique Boubion

Michael S. Carrillo
Dominique L. Boubion
Attorneys for Plaintiffs

DATED: October 17, 2025

**MANNING & KASS
ELLROD. RAMIREZ. TRESTER LLP**

By /s/ Lynn Carpenter

Eugene P. Ramirez
Lynn Carpenter
Attorneys for Defendants COUNTY OF
LOS ANGELES, et al.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 801 S. Figueroa St, 15th Floor, Los Angeles, CA 90017-3012.

On October 17, 2025, I served true copies of the following document(s) described as **STIPULATION AND JOINT REQUEST FOR DISMISSAL OF DEFENDANT CARLOS MACIEL WITHOUT PREJUDICE** on the interested parties in this action as follows:

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Dominique Leah Boubion**
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BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 17, 2025, at Los Angeles, California.

/s/ Sandra Alarcon

Sandra Alarcon